

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VICTOR COYOTL CUAYA,

Plaintiff,

-VS-

VI DEVELOPMENT GROUP LLC d/b/a BREAD &  
BUTTER, 570 KCBS CORP. d/b/a BREAD & BUTTER,  
401 KCBS CORP. d/b/a BREAD & BUTTER, 462  
BKCS LTD. d/b/a BREAD & BUTTER, BKCS LTD.  
d/b/a BREAD & BUTTER, K&H 14 INC. d/b/a BREAD  
& BUTTER, FOOD & BEYOND, LLC d/b/a BREAD &  
BUTTER, TERENCE PARK and BYUNG IL PARK,

Defendants.

19 CIV. 4290 (RA) (JLC)

ECF CASE

**DECLARATION OF JESUS MORALES**

I have been employed continuously by Bread & Butter located at 419 Park Avenue South, New York, New York, since October 2014.

1. I have been working in the juice department and do not know who plaintiff is. I was told that he may have used the name "Victor Perez" but this name is not familiar either.
2. During my employment, none of the employees including myself ever worked for any other Bread & Butter locations. Furthermore, there is no interaction between our store and the other Bread & Butter stores.
3. I am not familiar with the individuals plaintiff claims to have worked with as they did not work at our store. (Gerardo, sandwich prep; Jose Luis, dishwasher; or Isabel, porter).

I declare under penalties of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 18, 2020

LAW OFFICES OF  
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Jesus Morales